

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Charles Kenyatta Jr., aka Charlie Cee

Plaintiff,

v.

Sean Combs, aka "Diddy," aka "P. Diddy," and Bad Boy Entertainment

Defendants.

Case No. **1:24-cv-06923-JGK-GS**

MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff, Charles Kenyatta Jr appearing pro se, respectfully submits this Motion for Leave to Amend the Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2) and states as follows:

1. Plaintiff filed the original complaint on **09/06/2024** asserting claims of trademark infringement, unfair competition, and related causes of action.
2. On January 16, 2025, following the motion conference, Plaintiff filed a letter with the Court requesting permission to amend the complaint to address Defendants' anticipated motion to dismiss and to include additional facts clarifying the roles of Defendants, including Defendant **Bad Boy Entertainment LLC**.
3. As of today's date, Plaintiff has not received a response from the Court regarding the January 16, 2025 letter. Consequently, Plaintiff is now filing this formal Motion for Leave to Amend the Complaint to ensure that the case may proceed without further delay.
4. Plaintiff seeks leave to amend the complaint to incorporate additional facts regarding Defendants' unauthorized use of Plaintiff's trademarks, promotional activities, and sales of merchandise.
5. This amendment is necessary to ensure that the complaint accurately reflects the claims and evidence. The proposed amended complaint, attached hereto as **Exhibit A**, sets forth the new factual details.
6. Under **Rule 15(a)(2)** of the Federal Rules of Civil Procedure, courts are directed to "freely give leave when justice so requires." Plaintiff's request is made in good faith and will not unduly delay these proceedings or prejudice Defendants.

Dated: 2/2/2025

Respectfully submitted,

Charles Kenyatta Jr

Charles Kenyatta # 22B3002

Collins Correctional Facility

PO Box 340

Collins, NY 14034

CHARLES KENYATTA, JR.

Plaintiff,

vs.

Sean Combs and
Bad Boy Entertainment LLC,

Defendant.

Case Number: 1:24-cv-00691

CERTIFICATE OF SERVICE

I, Crystal Kenyatta, acting as Power of Attorney for the defendant, Charles Kenyatta Jr, hereby certify that on this 02/02/2025, I served a true and correct copy of the foregoing **MOTION FOR LEAVE TO AMEND COMPLAINT** upon the following party by email.

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